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August 14, 2008

BY FACSIMILE
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The Honorable Debra C. Freeman
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 525
New York, New York 10007

AUG 14 2008

Re: Federal Insurance Co. v. M/V SCI TEJ, *et al.*
07 Civ. 7797 (LTS) (DCF)
Our File No.: 1602.0001

SO ORDERED: DATE: 8/15/08
.....
DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

Dear Judge Freeman:

We represent defendant MacAndrews & Company Limited in this nonjury admiralty matter and write to respectfully request an extension of the discovery cut-off date until October 17, 2008, with a parallel extension of the remaining deadlines. Discovery is currently scheduled to end on August 27, 2008.

The defendant makes this request, with the consent of plaintiff, because counsel believe this additional time is required to conclude an investigation of various facts that both sides have identified as highly probative on liability issues. These include the provision and packing of the five containers in Pakistan; the consequences, if any, of the extended voyage of the transporting vessel; and the handling and custody of the containers after unloading in New Jersey. In addition, plaintiff has indicated that it wishes to go forward with a deposition of the defendant. However, all potential witness that plaintiff may designate are located overseas. Nevertheless, counsel are confident that such plaintiff's deposition can be completed within the additional time by telephone.

Beyond the need for additional fact discovery overseas, the parties have had ongoing discussions on a possible settlement of this matter. A settlement demand and counter offer have been exchanged. Both counsel fully believe that the additional time requested herein will permit further progress on this front. Mr. Mazaroli has advised that he has overseas travel scheduled between September 5 and 23, 2008.

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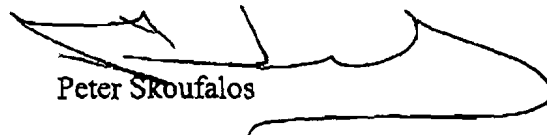
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This is the third request for such relief, and all prior requests have were granted.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

BROWN GAVALAS & FROMM LLP



Peter Skoufalos

cc: David L. Mazaroli, Esq.
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